

NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Division of Environment Waste Management Program

Initial Inspection: Yes No Follow-up Inspection: Yes No Complaint: Yes No
Hazardous Waste: LDF () TSF () GEN () KG () SQ () UNV () NOT A GEN () OTHER () _____
Used Oil: UOG () UOT () UOM () UOP () UOB ()
Solid Waste: SLF () TRS () CDL () ILF () YWC () SWP () HHW () OBS () MTP () WTM () WTP () WT

TO: KNIG BERNUTH 6 / 9 / 10
502 S. 15th ELWOOD, KS 66024 Doniphan
 Facility Name Address City State Zip Code Date

K	S	R	0	0	0	5	0	4	9	6	9
---	---	---	---	---	---	---	---	---	---	---	---

EPA Identification No.

[illegible]

Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and/or hazardous waste statutes and regulations.

☒ Violations As Follows

☐ No Violations Identified

Citation

Description of Violation

- | Citation | Description of Violation |
|----------------------------------|---|
| ① KAR 28-31-4(c)(i) | Inaccurate notification (missing Foo2 / 0019 / 0022 waste codes) |
| ② KAR 28-31-4(j)(i) | Use of more than one satellite accumulation container for same waste stream @ same location |
| ③ KAR 28-31-16 ^(b) 40 | CFR 279.22 (c) Failure to mark container if used oil = CDI * |

☐ Other Comments/Concerns:

Your response must be submitted to:

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDEH and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 30 days of receipt of this notice a description of all corrective actions taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Kansas Department of Health
Northeast District Office
Waste Management Program
800 West 24 Street
Lawrence, Kansas 66046-4

508087



RCRA

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (785) 842-4600 or Bureau of Waste Management in the Topeka office at (785) 296-1600.

This Notice was prepared by:

Laura ROUTE

Date 6 / 9 / 10

I, the undersigned here, _____, of _____, have received and read this Notice.

Printed Name: Sharlene Parry

Signature: Sharlene Harris

Title: Plant Manager

Date 6 / 9 / 10

COPIES: White-Facility; Yellow-Bureau of Waste Management; Blue-District

CDI* = corrected during inspection

Initial Inspection: Yes No Follow-up Inspection: ~~Yes~~ No Complaint: Yes No
Hazardous Waste: LDF () TSF () GEN () ~~KG ()~~ SQ ~~()~~ UNV () NOT A GEN () OTHER () _____
Used Oil: UOG () UOT () UOM () UOP () UOB ()
Solid Waste: SLF () TRS () CDL () ILF () YWC () SWP () HHW () OBS () MTP () WTM () WTP () WTR () WTT ()

TO: KMG BERNUTH 6 / 9 / 10
502 S. 15th Facility Name ELWOOD, KS 66024 Date Doniphan
 Address City State Zip Code County

K	S	R	0	0	0	5	0	4	9	6	9
---	---	---	---	---	---	---	---	---	---	---	---

[illegible]

This inspection was conducted to determine compliance with the state and federal solid and/or hazardous waste statutes and regulations.

☒ Violations As Follows

☐ No Violations Identified

Citation	Description of Violation
① KAR 28-31-4(c)(1)	Inaccurate notification (missing F002 / D019 / D022 waste codes)
② KAR 28-31-4(j)(1)	Use of more than one satellite accumulation container for same waste stream @ same location
③ KAR 28-31-10 ^(b) /40	CFR 279.22(c) Failure to mark containers of used oil = CDI *

☒ Other Comments/Concerns:

Other Comments/Concerns:

- a) storage area inspection record template & aerosol
can information for tracking
- b) Please submit copy of PPE/debris analysis.
→ determine & mark lab pack drum instrax.

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 30 days of receipt of this notice a description of all corrective actions taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to:

Kansas Department of Health and Environment
Northeast District Office
Waste Management Program
800 West 24 Street
Lawrence, Kansas 66046-4417

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (785) 842-4600 or Bureau of Waste Management in the Topeka office at (785) 296-1600.

This Notice was prepared by:

Laura ROUTH

Date 6 / 9 / 10

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: Sharlene Parry

Signature: Sharlene Paim

Title: Plant Manager

Date 6 / 9 / 10

COPIES: White-Facility; Yellow-Bureau of Waste Management; Blue-District

CDI* = corrected during inspection.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

BUREAU OF WASTE MANAGEMENT
BUREAU OF ENVIRONMENTAL FIELD SERVICES

**COMPLIANCE INSPECTION CHECKLIST
HAZARDOUS WASTE COVER PAGE**

General	<input checked="" type="checkbox"/> Routine	<input type="checkbox"/> Complaint
----------------	--	---

EPA/ ID/Permit No. KSR 000 504 969 Time 10 AM Date 6/9/10

Facility Name KMG Bernuth District NE

Street 502 S 15th Street City Elwood ,KS ZIP 66024

Mailing Address (if different than above) same

County Doniphan Number of Employees 12

Phone 913-365-5215 Fax 913-365-5275 e-mail sparry@kmgchemicals.com

Contact(s) Sharlene Parry Inspector(s) Laura D. Routh

Type of Business pesticidal ear tag manufacturing

Operating Hours and Days 1 shift - 7-3:30

Lat/Long Location Method: _____ Lat/Long Location Feature: _____

Latitude: (e.g. 37.57621) _____ Longitude: (e.g. -101.57621) _____

Has the Lat/Long been entered in the SW database? Yes ☐ No ☒

Hazardous Waste Inspection: ☒ Yes ☐ No
 Generator Classification: ☐ Closed/Inactive ☒ Small Qty. Generator ☐ EPA Generator
☐ Not a Generator ☐ Kansas Generator ☐ Transporter

Other Regulated Activities: ☐ T/S/D Facility ☐ Tank System ☐ Subpart BB
 (complete applicable checklist) ☐ Universal Waste Activities

Has the company declared any information/processes as trade secrets KSA 65-3447? _____
 If yes, explain: _____

If facility is closed/inactive, or has recently moved please provide a brief description.

Used Oil Activities: ☒ Yes ☐ No

Does the facility have a total above-ground storage capacity of used oil (excluding containers less than 55-gallons) of more than 1,320 gallons? ☐ Yes ☒ No ☐ NA

If yes, then the facility is subject to SPCC requirements due to used oil activities.
 Does the facility have a SPCC Plan? ☐ Yes ☐ No ☒ NA

Facility Used Oil Activities (Attach a checklist for each one marked):

<input checked="" type="checkbox"/> Generator	<input type="checkbox"/> Collection Center / Aggregation Point
<input type="checkbox"/> Transporter / Transfer Facility	<input type="checkbox"/> Used Oil Processor / Re-Refiner
<input type="checkbox"/> Used Oil Burner (Off-Spec Fuel)	<input type="checkbox"/> Used Oil Marketer

Attach all applicable checklists.

HAZARDOUS WASTE GENERATOR COMPLIANCE INSPECTION CHECKLIST

WASTE STREAM TABLE

(List all hazardous wastes first, followed by solid wastes.)

Waste Description or Process	Hazardous Waste Codes (or universal, recycled, exempt, or non-hazardous)	Waste Determination Method (process knowledge or analytical data)	Waste Amount Generated Per Month	Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (name of TSDF, MSWLF, recycler, etc.)
Hazardous waste solvents and reagents	D001, D002, D003, F002, D019, D022	knowledge	<5 gallons per quarter	None (5-gallon satellite container to be moved to storage as a result of inspection)	6/4/10	Heritage Crystal Clean
CUP solvent	n/a	n/a	n/a	n/a	n/a	Heritage Crystal Clean
DOA solvent (plasticizer)	Hazardous – D001	knowledge	intermittent	n/a	n/a	Heritage Crystal Clean
Fluorescent bulbs	recycled	n/a	n/a	none	n/a	Heritage Crystal Clean
Waste oil	Non-hazardous but incinerated	knowledge	1 drum every 6 months	Partially full drum	n/a	Heritage Crystal Clean
Production wastes	Non-hazardous but incinerated	knowledge	4500 pounds a year	none	n/a	Heritage Crystal Clean
PPE and debris	Non-hazardous	analytical	2000 pounds/quarter	1 gaylord box	n/a	Deffenbaugh

RCRA Compliance Evaluation Inspection Summary

KMG Bernuth
502 S. 15th
Elwood, Kansas 66024

EPA ID No.: KSR 000 504 969

Inspection Date: June 9, 2010

KDHE Inspector: Laura D. Routh
Bureau of Environmental Field Services (BEFS)
North East District Office (NEDO)

1.0 INTRODUCTION

On June 9, 2010, I conducted a routine compliance inspection at the facility referenced above to determine compliance with the State of Kansas waste regulations. The focus of the inspection was to identify types of wastes generated, points of waste generation, methods of waste management, and review relevant documents. This inspection was conducted under the authority of Kansas Administrative Regulation (K.A.R.) 28-31-12.

The facility manufactures insecticidal ear tags for the livestock industry, and liquid and dust formulations of insecticides for cattle, swine, poultry. The 84,000 square foot facility consists of manufacturing, formulation and packaging occurring in three buildings. The main building contains an upstairs office and lab area and a downstairs production area and warehouse. The storage building contains feedstock chemical products and equipment. The waste storage building was empty at the time of the inspection, with the exception of one labpack drum. No activities occur outside the building.

2.0 PREVIOUS INSPECTIONS AND VIOLATIONS

The facility was formerly part of Boehringer Ingelheim Vetmedica, Inc., which also has a production facility in Elwood., KS, directly adjacent to the KMG Bernuth facility. KMG Bernuth bought the Elwood facility from Boehringer Ingelheim in 2006. As KMG Bernuth, this location has never been inspected by the KDHE NEDO waste program before.

3.0 CHANGES SINCE PREVIOUS INSPECTION

n/a.

4.0 INSPECTION

I arrived at the facility at 10:00 a.m. and met with Sharlene Parry, Plant Manager. I presented my credentials and discussed the purpose and procedures of the routine compliance inspection. Ms. Parry explained the facility operations and described each of the facility's waste streams. I then conducted a walk-through inspection of the interior

KMG Bernuth

KSR 000 504 969

Inspection Date: June 9, 2010

Page 2 of 4

and exterior of the facility. Ms. Parry accompanied me during the walk-through inspection. The facility generates one type of hazardous waste: chlorinated and non-chlorinated solvents and reagent waste in the analytical lab.

No environmental concerns were observed around the perimeter of the building.

Upon completing the walk-through inspection, Ms Parry provided me with the requested documents for review. Documents reviewed included hazardous waste manifests; record of fee payment; storage area inspection records; waste determination analytical; material safety data sheets (MSDSs) and notification forms.

The facility is notified as a Kansas Generator, although based on a review of manifests and assessment of generation rates confirmed during the inspection, the facility is actually a small quantity generator. I encouraged Ms. Parry to consider re-notification.

Ear Tag Production

Ear tags are fashioned from plastic imbedded with pesticide. They are then punched out of sheets, and packaged.

Waste streams include process dust and ear tag scraps, bag house filters and activated carbon filters. There are two clean rooms in this area of the facility, one for blending and the other for R&D—neither were operating on the day of the inspection.

According to Ms. Parry, all wastes generated in this area are non-RCRA but are shipped for incineration due to non-RCRA pesticide residues. There are 3 collection containers—in the ROL clean room; the molding area and the blend room. See map in attachment 1.

All other production area wastes, including gloves and packaging, are shipped to the landfill. See photo 2. Ms. Parry stated that analytical had been conducted on gloves and debris. She did not have a copy available at the time of the inspection. This analytical was requested as part of the Notice of Non-Compliance (NONC).

Warehouse and Maintenance Area

Along the southern center wall of the warehouse area, there is a wash station used for cleaning equipment. Wastewater is piped for pre-treatment to the Boehringer Ingelheim facility across the street. The maintenance shop generates parts washer solvent managed by Heritage Crystal Clean under a continued use program (CUP). Fluorescent bulbs are collected in this area, for recycling, also through Heritage. I observed an empty aerosol can in a trash receptacle at the warehouse door. See photo 5. I later provided Ms. Parry with a technical guidance document on aerosol can recycling.

Chemistry (QA/QC) lab

There are two labs in the KMG facility, upstairs from production. One lab is mothballed and is currently used only for storage. The second lab is active and is used for product analysis. The lab in use generated hazardous solvent and reagent wastes. See violation 2.

Hazardous Waste Storage Area:

Inside the hazardous waste storage building, I observed empty drums; spill control supplies; and one 80-gallon metal overpack with a 30-gallon fiber drum inside that was described as containing waste retain product samples belonging to Boehringer Ingelheim. Ms. Parry stated that the wastes were non-hazardous. She indicated that she did not know they were present and that she would contact Boehringer Ingelheim to arrange for disposal. See photo 1.

She explained that KMG had last shipped hazardous waste at the end of May, 2010 and had not had hazardous wastes in storage since. In the NE corner of the storage building, there is a sump pit in the floor. Ms. Parry confirmed that it does not have a drain outlet but is intended to capture and retain anything that is spilled in the building.

Upon completing the walk-through inspection, Ms. Parry provided me with the requested documents for review. Documents reviewed included: hazardous waste manifests; material safety data sheets (MSDSs) and notification forms.

5.0 DISCUSSION OF VIOLATIONS

Violation 1: Inaccurate notification, per KAR 28-31-4(c)(1). The facility's notification lists 3 waste codes: D001, D002, D003 (see attachment 2). These waste codes did not correspond with the following waste codes observed on manifests: F002/D019 and D022, which reflect reagent wastes generated in the facility's analytical laboratory, all of which are shipped from the facility as hazardous waste.

Violation 2: KAR 28-31-4(j)(1). Use of more than one satellite accumulation container for the same waste stream at the same location. At the time of the inspection, I observed two 5-gallon metal cans, both containing hazardous waste solvent and reagents, in the same hood inside the analytical lab. One was marked with an accumulation end date of 6/4/10 and the other was marked with a start date of 6/4/10. I explained to Ms. Parry that because the full container had been left in place in the hood for more than 3 days, and not transferred to the storage area, thus a violation was being cited. See photos 6-8.

KMG Bernuth

KSR 000 504 969

Inspection Date: June 9, 2010

Page 4 of 4

Violation 3: KAR 28-31-16(a)/40 CFR 279.22(C): Failure to mark container of used oil with the words used oil. At the time of the inspection, I observed a 55-gallon black metal drum described as containing used oil. The drum was not marked. See photo 3. I explained the requirements to Ms. Parry and she directed an employee in the production area to mark the drum. He marked the drum waste oil. See photo 4. I explained that the drum needed to be marked "used oil" Ms. Parry expressed the belief that the oil was in fact "waste" oil, not used oil, because it was being sent for incineration, not reclamation or recycling, because it had the potential to be contaminated with non-RCRA pesticide residues.

6.0 EXIT CONFERENCE

I met with Ms. Parry to discuss the results of the inspection. I explained the violations cited, and noted that Violation 2 was corrected during the inspection. I discussed the notification of regulated waste activity form, which indicated that the facility was a Kansas Generator. I subsequently provided Ms. Parry with a link to the notification form and suggested that the company re-notify as a Small Quantity Generator. See attachment 3.

At the conclusion of the exit conference, I provided Ms. Parry with a copy of the Notice of Compliance (NOC). A compliance date of 7/9/10 was established.

I informed Ms. Parry that violations could still be identified once the information gathered during the inspection had been reviewed.

7.0 LIST OF HANDOUTS PROVIDED TO FACILITY

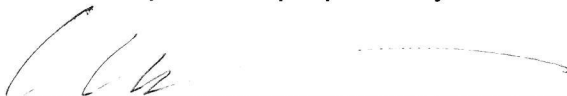
See attachment 3.

8.0 LIST OF ATTACHMENTS

1. Diagram of facility
2. Notification of Regulated Waste Activity Form
3. Email to Ms. Parry

9.0 SIGNATURE OF AUTHOR/INSPECTOR

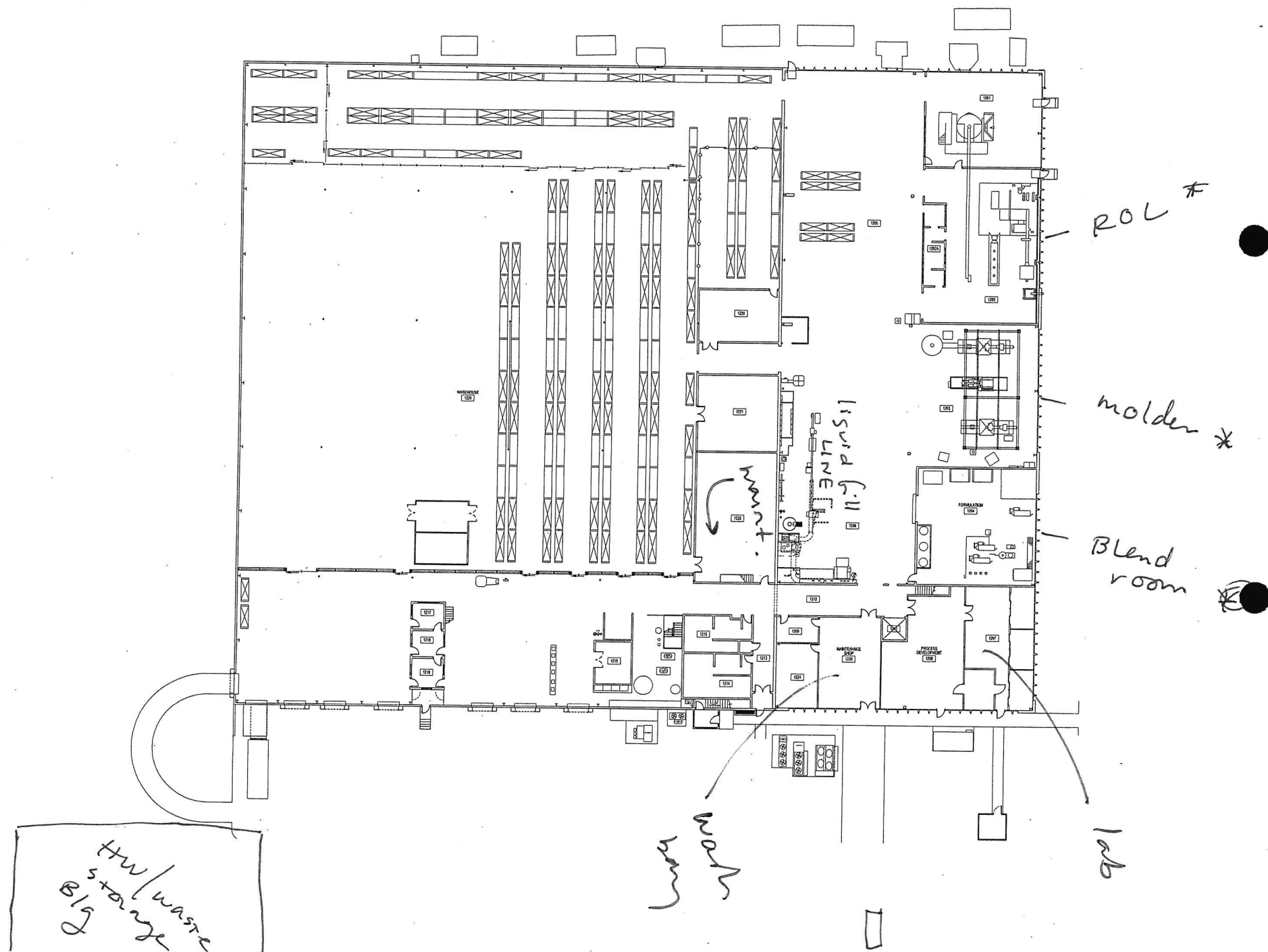
This report was prepared by: Laura D. Routh



Signature

Attachment # /

calcites *
for non-Reed
production
uses



Attachment # 2

Hazardous Waste Site Info Verification Report December 15, 2009

The information summarized below has been entered into EPA's RCRA Computer Database for the location and EPA Identification Number listed. Please review carefully. If any of the enclosed information is incorrect or has changed, cross through the incorrect information and clearly print or type the correct information beside it. If information is not shown, refer to the attached instructions or telephone (785) 296-6898. Please sign, title, and date the certification area at the bottom of this report, regardless of whether the information was correct or incorrect, and submit to:

Kansas Dept of Health & Environment
1000 SW Jackson, Suite 320
Topeka, KS 66612-1366

KSR000504969

TYPE(S) OF REGULATED ACTIVITY: Federal Small Quantity Generator
KANSAS GENERATOR FEES PAID 2007
KANSAS GENERATOR FEES PAID 2008
KANSAS GENERATOR FEES PAID 2009

Hazardous Wastes Handled: D003 D001 D002

1st N 04/03/06 N 03/19/09 2

Certified by Notification on 03/19/09 by
SHARLENE PARRY 03/18/09
MGR

CERTIFICATION BY OWNER(S), OPERATOR(S), or AUTHORIZED REPRESENTATIVE(S): I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sharlene Parry
Signature

Sharlene Parry Plant Manager
Name and Official Title (Print)

1-12-10
Date Signed

All information you submit in a notification can be released to the public, according to the Freedom of Information Act, unless it is determined to be confidential by U.S. EPA pursuant to 40 CFR Part 2. Since notification information is very general, the U.S. EPA believes it is unlikely that any information in your notification could qualify to be protected from release. However, you may make a claim of confidentiality by printing the word "CONFIDENTIAL" on both sides of the Notification Form and on any attachments or submittals including this information report. EPA will take action on the confidentiality claims in accordance with 40 CFR Part 2.

Attachment # 3

Laura Routh

From: Laura Routh
Sent: Wednesday, June 09, 2010 3:28 PM
To: 'sparry@kmgchemicals.com'
Subject: follow-up to KDHE Hazardous Waste Inspection
Importance: High
Attachments: Waste Determination Form 1-11-10.docx; weekly inspection form.pdf; Kansas Generator Emergency Response Information.pdf

Thank you for your time today.

As promised, here are the links and documents we discussed: attached is a waste determination template worksheet you may use. Also attached is a weekly inspection template and also an emergency posting **required** of Kansas Generators.

Additional information regarding making a waste determination can be found in the Hazardous Waste Generator Handbook at the following link:

www.kdheks.gov/waste/forms/hazwaste/gen700-HWGenHandbookApr2006.pdf

To update your notification/revise waste codes, please use the following form:

<http://www.kdheks.gov/waste/forms/hazwaste/gen500-notifyofregactivity-hwgen.pdf>

Here is a TGD on use oil and oil filter management:

<http://www.kdheks.gov/waste/techguide/hw99-01.pdf>

Here is a technical guidance document on aerosol can management:

<http://www.kdheks.gov/waste/techguide/hw05-01.pdf>

Please confirm receipt of this email, so that I will know it went through to you.

Let me know if you have any questions.

Cordially,

Laura

Laura D. Routh, CHMM
Environmental Scientist
Waste Management Program
Bureau of Environmental Field Services
Northeast District Office
Kansas Department of Health and Environment
800 W. 24th Street, Lawrence, KS 66046
(785) 842-4600
FAX: (785) 842-3537

please note my new email address: lrouth@kdheks.gov

7/6/2010

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
NE District Office

The digital photographs contained in this report were recorded directly to an archival file or electronic media (such as a compact disc, digital versatile/video disc, or tape) prior to viewing on a computer system. KDHE certifies that such digital photographs are thus identical to the digital photographs taken during the inspection/investigation.

Site Name: KMG Bernuth
Address: 502 S. 15th Street
County: Doniphan
Legal: _____

EPA ID No.: KSR 000 504 969
City: Elwood
Camera: LUMIX LCZ
Taken By: Laura D. Routh

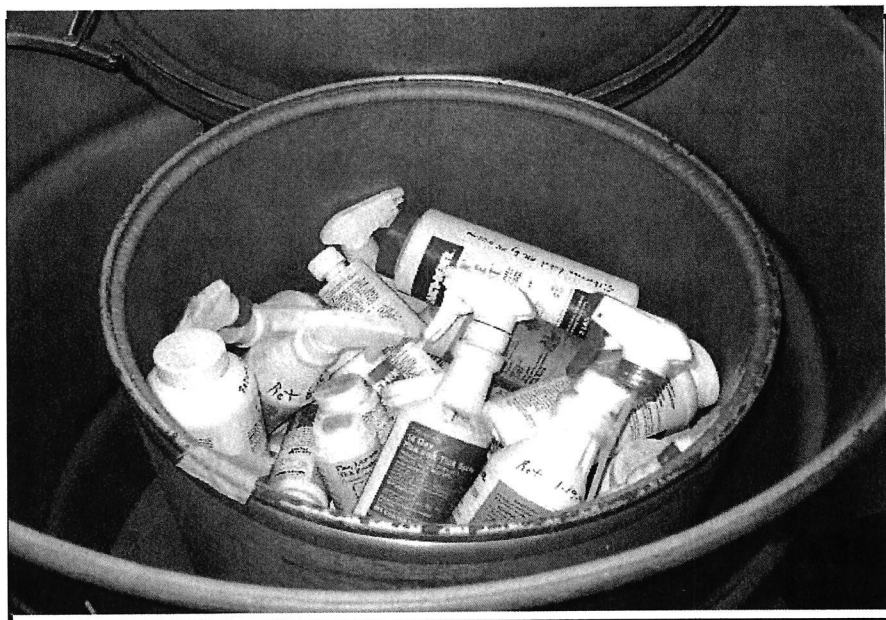


Photo No.:	<u>1</u>
Archive Disc File No.:	<u>P1060975</u>
Date:	<u>June 9, 2010</u>
Time:	<u>10:22 AM</u>
Location:	<u>waste storage building</u>
Direction Faced:	<u>down</u>
Weather Conditions:	<u>hot, sunny</u>
Comments:	<u>30 gallon fiber drum inside 8-gallon metal overpack drum containing non-RCRA waste pesticide retain samples. Ms. Parry stated that these were the property of Boehringer Ingelheim.</u>

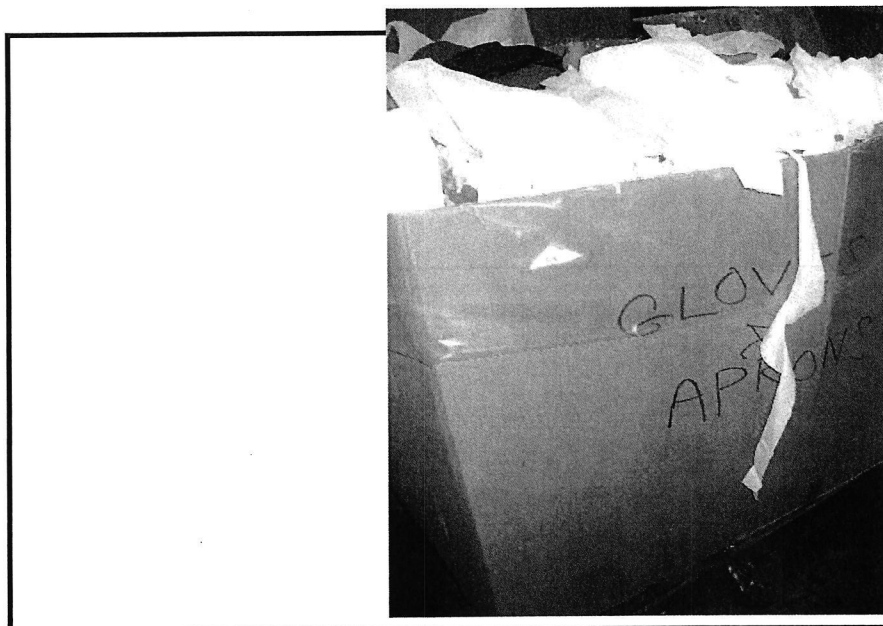


Photo No.:	<u>2</u>
Archive Disc File No.:	<u>P1060979</u>
Date:	<u>June 9, 2010</u>
Time:	<u>10:38 AM</u>
Location:	<u>production area</u>
Direction Faced:	<u>WNW</u>
Weather Conditions:	<u>hot, sunny</u>
Comments:	<u>box of misc. debris generated in ear tag production area. The facility has conducted analytical on this waste stream and determined it to be non-hazardous.</u>

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
NE District Office

The digital photographs contained in this report were recorded directly to an archival file or electronic media (such as a compact disc, digital versatile/video disc, or tape) prior to viewing on a computer system. KDHE certifies that such digital photographs are thus identical to the digital photographs taken during the inspection/investigation.

Site Name: KMG Bernuth
Address: 502 S. 15th Street
County: Doniphan
Legal: 0

EPA ID No.: KSR 000 504 969
City: Elwood
Camera: LUMIX LCZ
Taken By: Laura D. Routh

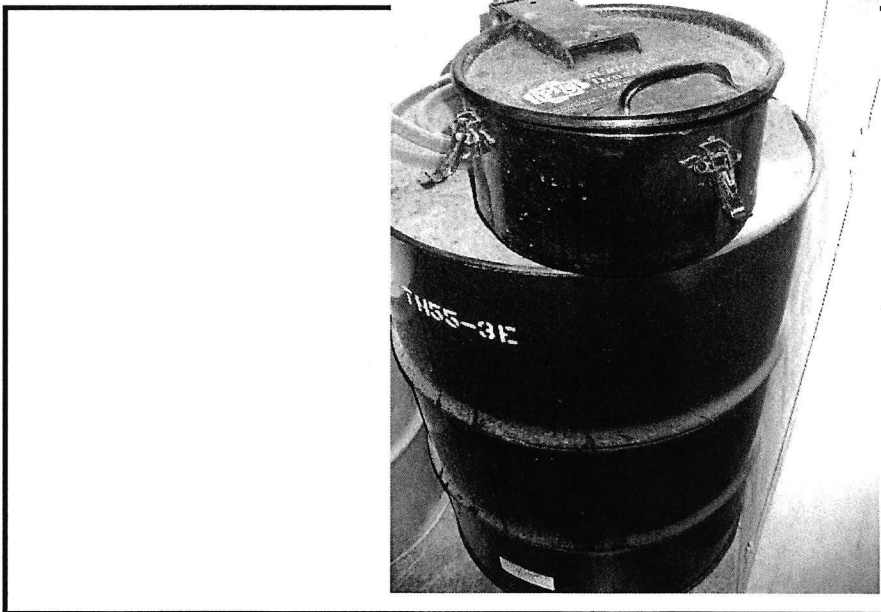


Photo No.:	<u>3</u>
Archive Disc File No.:	<u>P1060980</u>
Date:	<u>June 9, 2010</u>
Time:	<u>10:41 AM</u>
Location:	<u>production area</u>
Direction Faced:	<u>down</u>
Weather Conditions:	<u>hot, sunny</u>
Comments:	<u>drum of used oil in ear tag production area. The drum was not marked.</u>

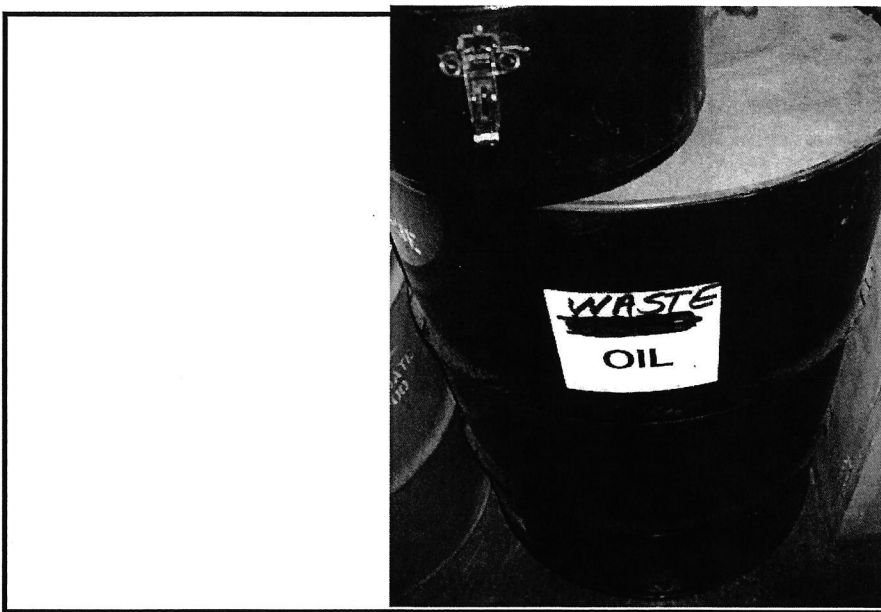


Photo No.:	<u>4</u>
Archive Disc File No.:	<u>P1060981</u>
Date:	<u>June 9, 2010</u>
Time:	<u>10:43 AM</u>
Location:	<u>production area</u>
Direction Faced:	<u>down</u>
Weather Conditions:	<u>hot, sunny</u>
Comments:	<u>drum of oil, once marked.</u>

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
NE District Office

The digital photographs contained in this report were recorded directly to an archival file or electronic media (such as a compact disc, digital versatile/video disc, or tape) prior to viewing on a computer system. KDHE certifies that such digital photographs are thus identical to the digital photographs taken during the inspection/investigation.

Site Name: KMG Bernuth
Address: 502 S. 15th Street
County: Doniphan
Legal: 0

EPA ID No.: KSR 000 504 969
City: Elwood
Camera: LUMIX LCZ
Taken By: Laura D. Routh

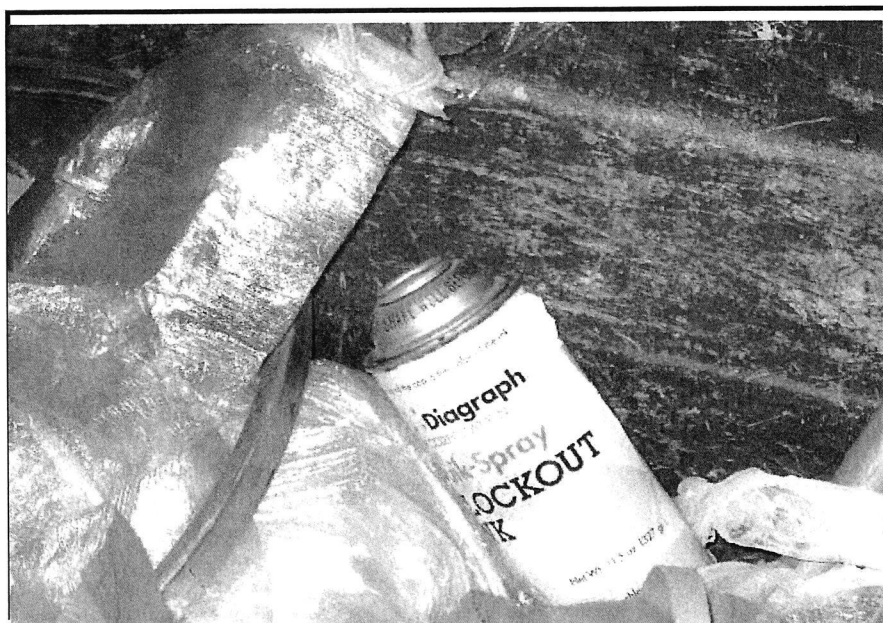


Photo No.: 5
Archive Disc File No.: P1060982
Date: June 9, 2010
Time: 10:47 AM
Location: warehouse
Direction Faced: down
Weather Conditions: hot, sunny
Comments:
empty aerosol can in trash receptacle in warehouse. I provided the facility with aerosol can recycling info

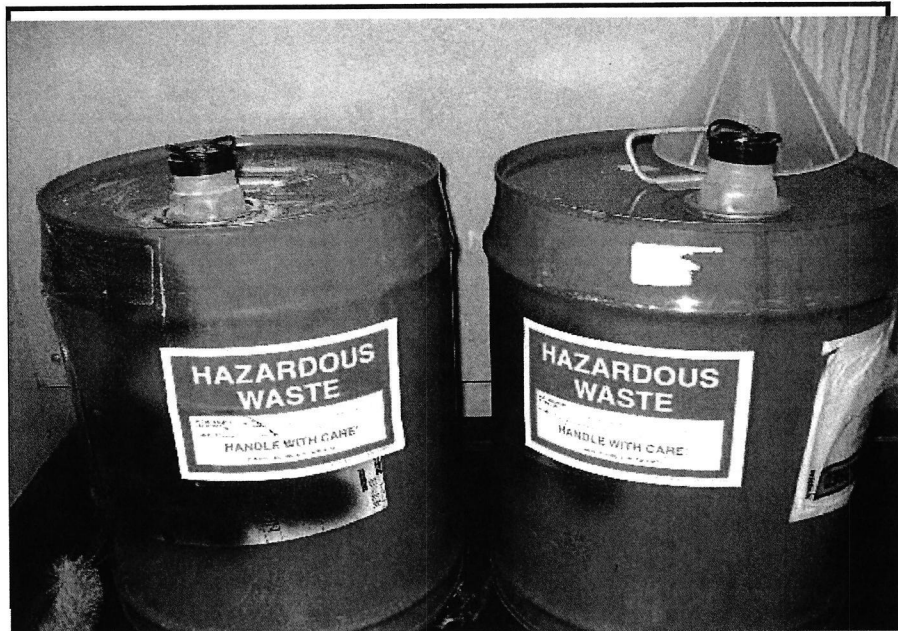


Photo No.: 6
Archive Disc File No.: P1060983
Date: June 9, 2010
Time: 10:57 AM
Location: analytical lab
Direction Faced: E
Weather Conditions: hot, sunny
Comments:
Two 5-gallon metal cans of the same type of solvent reagent waste under the same hood; the can on the left is full; the can on the right is partially full.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
NE District Office

The digital photographs contained in this report were recorded directly to an archival file or electronic media (such as a compact disc, digital versatile/video disc, or tape) prior to viewing on a computer system. KDHE certifies that such digital photographs are thus identical to the digital photographs taken during the inspection/investigation.

Site Name: KMG Bernuth
Address: 502 S. 15th Street
County: Doniphan
Legal: 0

EPA ID No.: KSR 000 504 969
City: Elwood
Camera: LUMIX LCZ
Taken By: Laura D. Routh



Photo No.:	7
Archive Disc File No.:	P1060984
Date:	June 9, 2010
Time:	10:57 AM
Location:	analytical lab
Direction Faced:	E
Weather Conditions:	hot, sunny
Comments:	Accumulation start date on can is 6/4/10, approximately 5 days prior to the inspection.



Photo No.:	8
Archive Disc File No.:	P1060985
Date:	June 9, 2010
Time:	10:57 AM
Location:	analytical lab
Direction Faced:	E
Weather Conditions:	hot, sunny
Comments:	This containers began receiving waste on 6/4/10, the same day that the containers shown in photo 8 became full.